

Citation

EDNA CARTER, INDIVIDUALLY AND ON BEHALF
OF THE ESTATE OF JOHNNY CARTER

Versus

BROOKSHIRE GROCERY COMPANY AND
SEDGWICK CLAIMS MANAGEMENT SERVICES, INC.

DOCKET NUMBER: C-47085C

FRANKLIN Parish, Louisiana
FIFTH JUDICIAL DISTRICT COURT

To: BROOKSHIRE GROCERY COMPANY
THROUGH ITS AGENT FOR SERVICE OF PROCESS
CT CORP SYSTEM
3867 PLAZA TOWER DR.
BATON ROUGE, LOUISIANA 70816

YOU HAVE BEEN SUED.

Petition In Suit For Damages and Request For Written Notice

Attached to this citation is a certified copy of the/ petition. The petition tells you what you are being sued for.

You must EITHER do what the petition asks, OR, within fifteen (15) days after you have received these documents, you must file an answer or other legal pleadings in the office of the Clerk of Court at the Franklin Parish Courthouse in the Town of Winnsboro.

If you do not do what the petition asks, or if you do not file an answer or legal pleading within fifteen (15) days, a judgment may be entered against you without further notice.

This citation was issued by the Clerk of Court for Franklin Parish, on this September 9, 2020.

ANITA WYGAL, Clerk of Court

By: Alene Mayo
Deputy Clerk of Court, Fifth District Court
Franklin Parish, Louisiana

RECEIVED ON THE _____ DAY OF _____, 20____ AND ON THE _____ DAY
OF _____, 20____ SERVED THE ABOVE NAMED PARTY AS FOLLOWS:

PERSONAL SERVICE ON THE PARTY HEREIN NAMED _____.

DOMICILIARY SERVICE ON THE PARTY HEREIN NAMED BY LEAVING THE SAME AT
HIS DOMICILE IN THE PARISH IN THE HANDS OF _____, A
PERSON APPARENTLY OVER THE AGE OF SEVENTEEN YEARS, LIVING AND RESIDED IN
SAID DOMICILE AND WHOSE NAME AND OTHER FACTS CONNECTED WITH THIS
SERVICE, I LEARNED BY INTERROGATING THE SAID PERSON, SAID PARTY HEREIN
BEING ABSENT FROM HIS RESIDENCE AT THE TIME OF SAID SERVICE.

RETURNED: PARISH OF _____ THIS _____ DAY OF
_____, 20____.

SERVICE \$ _____
MILEAGE \$ _____
TOTAL \$ _____

BY: _____
DEPUTY SHERIFF

ORIGINAL – RETURN

COPY – SERVICE

COPY - CLERK

ATTEST
A TRUE COPY
Alene Mayo
DY. CLERK OF COURT, FRANKLIN PARISH, LA

Document Number: D720995

STATE OF LOUISIANA * PARISH OF FRANKLIN

FIFTH JUDICIAL DISTRICT COURT

EDNA CARTER, INDIVIDUALLY AND ON BEHALF
OF THE ESTATE OF JOHNNY CARTER

FILED:

September 2, 2020

VERSUS

NO. 47,085C

BROOKSHIRE GROCERY COMPANY
AND SEDGWICK CLAIMS MANAGEMENT
SERVICES, INC.

BY:

Alene Mayo
DY. CLERK OF COURT

PETITION IN SUIT FOR DAMAGES

The petition of EDNA CARTER a major domiciliary of at the time of the accident
Franklin Parish, Louisiana, through undersigned counsel, respectfully represents:

1.

The following parties are made defendants herein:

BROOKSHIRE GROCERY COMPANY, a company authorized to do business
and doing business in the State of Louisiana;

SEDGWICK CLAIMS MANAGEMENT, SERVICES, INC. (the insurance carrier
of BROOKSHIRE GROCERY COMPANY) an insurance corporation authorized
to do business and doing business in the State of Louisiana.

2.

On November 4, 2019, petitioner, JOHNNY CARTER was walking in Super One, when
he slipped in a puddle of water on the floor near the meat market in Winnsboro, Franklin
Parish, Louisiana.

3.

BROOKSHIRE GROCERY COMPANY had a puddle of water on the floor in Winnsboro,
Franklin Parish, Louisiana.

4.

Defendant BROOKSHIRE GROCERY COMPANY was at fault in connection with this
accident.

5.

This accident was caused by the negligence of BROOKSHIRE GROCERY COMPANY
in some or all of the following ways, but not limited hereto:

- a. failure to keep the floor clear;
- b. failure to maintain safety;
- c. failure to pay proper attention to the floors;
- d. failure to inspect;

- e. failure to warn.

6.

Prior to the accident defendant SEDGWICK CLAIM MANAGEMENT SERVICES, INC. had issued a policy to provide liability coverage to said policy was in full force and effect at the time of the accident.

7.

As a result of this accident, plaintiff JOHNNY CARTER suffered bodily injuries including but not limited to:

- a. physical pain and suffering, past;
- b. mental anguish and worry; past
- c. medical expenses, past;
- d. loss of enjoyment of life, past;
- e. legal interest on the amount of damage award; and
- f. all costs of these proceedings.

8.

As a result of this accident, plaintiff EDNA CARTER suffered the following, including but not limited to:

- a. mental anguish and worry, past, present and future;
- b. loss of enjoyment of life, past, present and future; and
- c. loss of consortium, pas, present and future.

9.

10.

EDNA CARTER INDIVIDUALLY AND ON BEHALF OF THE ESTATE OF JOHNNY CARTER prays for damages in an amount as follows:

An amount to be sufficient to provide for all damages sustained as a result of this accident, in accordance with the law and evidence in this case, plus legal interest and costs.

WHEREFORE PLAINTIFFS PRAY for judgment against defendants BROOKSHIRE GROCERY COMPANY and SEDGWICK CLAIM MANAGEMENT SERVICES, INC., in solido, for the amount set forth above with legal interest thereon from date of judicial demand until paid, and all costs of this proceeding.

Respectfully submitted by,

LAW OFFICES OF:


HALES & STRICKLAND
Myrt T. Hales, Jr. (#6426)
Joshua L. Strickland (#36690)
802 Julia Street
P. O. Drawer 149
Rayville, Louisiana 71269
Telephone: 318-728-4413
FAX #318-728-6773

PLEASE SERVE:

BROOKSHIRE GROCERY COMPANY
c/o agent for service
CT Corp System
3867 Plaza Tower Dr.
Baton Rouge, LA 70816

Sedgwick Claims Management Service, Inc.
c/o agent for service
Corporation Service Company
501 Louisiana Avenue
Baton Rouge, LA 70802

ATTEST

A TRUE COPY


DY. CLERK OF COURT, FRANKLIN PARISH, LA

STATE OF LOUISIANA * PARISH OF FRANKLIN

FIFTH JUDICIAL DISTRICT COURT

EDNA CARTER, INDIVIDUALLY AND ON BEHALF
OF THE ESTATE OF JOHNNY CARTER

VERSUS

NO. 47,085C

BROOKSHIRE GROCERY COMPANY
AND SEDGWICK CLAIMS MANAGEMENT
SERVICES, INC.

FILED: September 22 2020

BY: Alene Mayo
DY. CLERK OF COURT

REQUEST FOR WRITTEN NOTICE

TO: CLERK, FRANKLIN PARISH

PLEASE TAKE NOTICE that the undersigned counsel, attorney for plaintiff, EDNA CARTER INDIVIDUALLY AND ON BEHALF OF THE ESTATE OF JOHNNY CARTER, do hereby request written notice of the date of trial of the above entitled and captioned matter, as well as notice of hearings (whether on merits or otherwise), orders, judgments, interlocutory decrees, and any and all formal steps taken by the parties herein, the Judge or any member of the Court, as provided in Louisiana Code of Civil Procedure of 1960, particularly Articles 1572, 1913, and 1914.

Respectfully submitted by,

LAW OFFICES OF:

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